

## **Briefing Statement**

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**Bureau:** National Park Service  
**Issue:** Valley Forge Asbestos Release Site  
**Park Site:** Valley Forge National Historical Park  
**Date:** October 2, 2008

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### **Background:**

In January 1997, during the installation of a fiber optic cable in the Amphitheater Quarry of Valley Forge National Historical Park (VAFO), park staff discovered a suspicious substance in the soil later confirmed to contain asbestos. At the request of the National Park Service (NPS), the U. S. Environmental Protection Agency (USEPA) initiated an emergency response action to abate the immediate risks to public health, welfare and the environment posed by the potential airborne release of asbestos from contaminated soils. The area where asbestos contamination is located is referred to as the Asbestos Release Site (ARS or Site).

The Keene Corporation (Keene), along with its predecessors-in-interest, operated an asbestos manufacturing facility at a location that is now part of VAFO. From approximately 1925 until the 1970s, Keene and its predecessors disposed of waste products resulting from its manufacturing operations in several inactive limestone quarries located both on property owned by Keene and, with authorization from the Commonwealth of Pennsylvania (Commonwealth), on adjacent property owned by the Commonwealth. It is this waste disposal practice that created the Site.

The Site is approximately 112 acres, divided into two operable units, and further divided into 15 Areas of Concern (AOCs). While the primary contaminant at the Site is asbestos, contaminants other than asbestos also have been detected, including arsenic, lead, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs), among others. NPS is the lead agency for Site remediation.

In December 1999, NPS and the Commonwealth, represented by the Pennsylvania Department of Conservation and Natural Resources (DCNR), reached an Agreement on Consent (Agreement) pursuant to which the Commonwealth conducted a Remedial Investigation and Feasibility Study (RI/FS) of the Site in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). On behalf of the Commonwealth, the Agreement was implemented by the Pennsylvania Department of Environmental Protection (PADEP).

In 2002, a settlement was reached with the legal successor to Keene, leaving the Commonwealth as the only remaining potentially responsible party at this Site. In 2006, the RI/FS was completed. Based upon that study, alternatives for remediation were developed and a preferred alternative was identified and presented to the public for review and comment in September 2006. A Record of Decision selecting a remedy was issued by NPS in January 2007.

**Current Status:**

Regular meetings are held among all stakeholders including the NPS, the Commonwealth, and local government representatives to gauge progress toward implementation of the selected remedy in conjunction with transportation projects important to all. The Commonwealth and the United States, through the Department of Justice on behalf of NPS and the USEPA, are engaged in constructive negotiations to resolve various claims concerning the Site. The parties have made substantial progress in these discussions. In the event such negotiations are successfully completed, the parties will lodge a consent decree and publicly announce a settlement at that time.

**Relationship of the Asbestos Release Site to the American Revolution Center**

Some citizens have asked whether the American Revolution Center (ARC) abandoned its original proposed site adjacent to the park Welcome Center because of the presence of asbestos. There is no relation between ARC's abrogation of its partnership with NPS and the presence of asbestos.

The original site was mutually chosen by the park and the ARC because of its central location; its proximity to existing infrastructure, including visitor facilities, roads, and utilities; and the fact that it was a previously disturbed site that would pose no impacts to historic and natural resources. No asbestos is present at that location and the location is not part of the Asbestos Release Site. The upcoming remediation of the Asbestos Release Site will have no effect on the original site.

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